

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF PUERTO RICO**

IN THE MATTER OF:

JOSE LIZARDI
Debtor

SUSAN SKELLY- HAND, PATRICK HAND AND
RACHEL HAND
Movants

v.

JOSE LIZARDI
Respondent

Case No. 15-3076 (ESL)
Chapter **11**

**MOTION TO REQUEST RESCHEDULING OF THE HEARING TO DISCUSS THE REQUEST
FOR MODIFICATION OF THE AUTOMATIC STAY**

TO THE HONORABLE COURT:

COMES NOW creditors Susan Skelly- Hand, Patrick Hand and Rachel Hand **(herein after The Hands)** represented by the undersigned attorney and respectfully set forth and prays as follows:

(1) On May 13, 2015, the Hands filed a Motion for Modification of the Automatic Stay (docket #13), a hearing was scheduled for June 9, 2015.

(2) Debtor, José Lizardi filed an opposition titled “Debtor’s Response in Opposition to Motion Requesting Modification of the Automatic Stay Filed by Unsecured Creditor”, on May 27, 2015. (Docket #19).

(3) On June 9, 2015, the Honorable Mildred Cabán Flores issued an order disqualifying herself from the present case. (Docket #27 and #28).

(4) The case was reassigned and this Court issued a notice rescheduling the final hearing for July 7, 2015. (Docket #36).

(5) Due to prior compromises, the movant who are residents of New York, are unable to fly to Puerto Rico on such date (July 7, 2015), thus they respectfully request that the final hearing on Motion for Modification of the Automatic Stay be rescheduled.

(6) The undersigned counsel contacted counsel for Debtor José Lizardi. After discussing the available dates for both parties counsel indicated that Debtor does not oppose to this request and agreed on rescheduling the hearing for the proposed dates of August 20, 2015 or August 21, 2015.

WHEREFORE movants respectfully request that the final hearing on Motion for Modification of the Automatic Stay be rescheduled to the proposed dates of August 20, 2015 or August 21, 2015; in the alternative, to postpone the hearing for the next available date, after August 21, on the Court's calendar.

CERTIFICATE OF SERVICE

I hereby certify that on this same date, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system which will send notification of such filing to **Carmen Conde Torres** counsel for the Debtor, the US Trustee and to all CM/ECF participants.

In San Juan, Puerto Rico, this 2 day of July, 2015.

GOLDMAN ANTONETTI & CORDOVA, LLC.
ATTORNEYS FOR CREDITOR,
Susan Skelly- Hand, Patrick Hand and Rachel
Hand
American International Plaza, 14th Floor
250 Muñoz Rivera Avenue
San Juan, PR 00918
Tel: (787) 759-4213
Fax: (787) 474-2335

/s/ Solymar Castillo Morales
Solymar Castillo Morales
USDC-PR #218310
e-mail: scastillo@gaclaw.com